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16 Attorneys for Defendant Infinite Labs, LLC

17 UNITED STATES DISTRICT COURT

18 CENTRAL DISTRICT OF CALIFORNIA

19 THERMOLIFE INTERNATIONAL, LLC)
20 Plaintiff,)
21 v.) CASE NO. CV12-09229 GAF (FFMx)
22 BETTER BODY SPORTS, LLC, *et al.*,)
23 Defendants.)
24)
25)
26)
27)
28)

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT BY
NOT MORE THAN 30 DAYS (L.R. 8-3)**

Complaint served: November 14, 2012
Current response date: December 5, 2012
New response date: January 4, 2013

Action filed: October 26, 2012
Trial Date: None set

1 Defendant, INFINITE LABS, LLC (hereinafter referred to as "Defendant") and Plaintiff,
2 THERMOLIFE INTERNATIONAL, LLC (hereinafter referred to as "Plaintiff"), by and through
3 the undersigned counsel and pursuant to Rule 6 of the Federal Rules of Civil Procedure and
4 Local Rule 8-3, hereby stipulate to a 30-day extension until Friday, January 4, 2013, for
5 Defendant to respond to Plaintiff's Complaint (*Dkt. # 1*). In support of this Stipulation, the
6 Parties hereby state the following:
7

8 1. On October 26, 2012, Plaintiff filed a Complaint (*Dkt. # 1*) against several
9 Defendants, including Defendant Infinite Labs, LLC.

10 2. On or about November 14, 2012, Defendant was served with the Summons and
11 Complaint; as such, Defendant's response to the Complaint is due on December 5, 2012.
12

13 3. Defendant's time for answering Plaintiff's Complaint has not expired and it seeks
14 an extension of time to and including January 4, 2013 to file a response to Plaintiff's Complaint.

15 4. Defendant retained undersigned counsel and, simply put, undersigned counsel
16 needs more time to get up to speed in the case. Defendant needs the time to and including
17 January 4, 2013 because, from what undersigned counsel has gleaned from Plaintiff's Complaint,
18 this lawsuit is a complex patent infringement matter composed of multiple parties and
19 substantive claims.
20

21 5. This Stipulation is hereby submitted so that justice may be done, and not for
22 purposes of delay. No significant hardship, prejudice or unfair surprise will be inflicted upon
23 Plaintiff if this request for an extension of time is granted.
24

25 6. Notwithstanding, any resulting hardship or prejudice is greatly outweighed by the
26 interests of justice and judicial economy.
27

28 7. Undersigned counsel has communicated with Plaintiff's counsel and he has

1 consented to this requested extension of time. Specifically, Defendant's counsel has requested,
2 and Plaintiff's counsel has agreed to, a 30-day extension until January 4, 2013 for Defendant to
3 respond to the Complaint.

4 WHEREFORE, Defendants request that this Court grant this Stipulation for an extension
5 of time for Defendant to respond to Plaintiff's Complaint and extend the time within which
6 Defendant must respond to and including January 4, 2013.
7

8 **CERTIFICATE OF CONFERENCE**

9 On November 28, 2012, counsel for Defendant communicated via email with Plaintiff's
10 counsel, Tyler J. Woods, Esq., regarding the substance of and relief requested in the foregoing
11 Stipulation and he advised that Plaintiff is not opposed to the relief request in this Stipulation.
12

13 Dated: November 30, 2012

14 Respectfully Submitted By:
15

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25 And,

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1 AND,
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s/ Tyler J. Woods _____
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11 Attorneys for Plaintiff
12 *Thermolife International, LLC*
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14

CERTIFICATE OF SERVICE

I hereby certify that on November 30, 2012, a true and correct copy of the foregoing has been served electronically upon all registered CM/ECF users in this case.

15 /s/ Shyamie Dixit _____
16 Shyamie Dixit, Attorney
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